

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re JUNO THERAPEUTICS, INC.

No. C16-1069 RSM

CLASS ACTION

**STIPULATION AND ORDER RE
AMENDMENT TO THE NOTICE OF
PENDENCY OF CLASS ACTION**

Plaintiffs Gilbert Hoang Nguyen and Susan Tan (“Plaintiffs”) and Defendants Juno Therapeutics, Inc., Hans E. Bishop, Steven D. Harr, and Mark J. Gilbert (collectively, “Defendants”) having met and conferred, submit the following Stipulation Regarding Amendment to the Notice of Pendency of Class Action, and ask the Court to enter an Order consistent with this Stipulation.

WHEREAS, on December 21, 2017, Plaintiffs filed an unopposed motion for an Order establishing a program and schedule for notice to the class of pending class action (Dkt. No. 109);

WHEREAS, the Notice of Pendency of Class Action required any class member seeking exclusion to timely mail a request for exclusion no later than March 19, 2018 (Dkt. No. 109-1);

WHEREAS, on December 22, 2017, the Court entered an Order granting Plaintiffs' unopposed motion for an Order establishing a program and schedule for notice to the class of pending class action, and approved the Notice of Pendency of Class Action and the Summary Notice (Dkt. No. 110);

WHEREAS, the parties have been working with the claims administrator to identify a complete list of shareholders identified on the books and records of the Company;

WHEREAS, the average time required to allow a shareholder to request exclusion is typically between 45 and 60 days from the date the notice is mailed;

WHEREAS, some shareholders may not have sufficient time to request exclusion from the deadline given that the current deadline is on March 19, 2018;

NOW, THEREFORE, the parties stipulate and agree as follows:

- 1) Plaintiffs shall initiate mailing of the notice of pendency of class action within ten (10) business days of the Court's Order approving this stipulation (the "Notice Date");
- 2) Plaintiffs shall modify the exclusion deadline in the notice of pendency of class action, and the new exclusion deadline shall be within sixty (60) days of the Notice Date.
- 3) The parties request that the Court enter the order proposed below.

IT IS SO STIPULATED.

Dated: February 26, 2018

s/ Cliff Cantor

By: Cliff Cantor, WSBA # 17893

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Attorneys for Defendants Juno Therapeutics, Inc., Hans E. Bishop, Steven D. Harr, and Mark J. Gilbert

ORDER

IT IS SO ORDERED.

Dated: February 28, 2018



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Submitted by:

s/ Cliff Cantor

By: Cliff Cantor, WSBA # 17893

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